



A09-0034 05/24/01

***National  
Environmental  
Achievement Track  
Application Form***

**3M Optical Systems**

Name of facility

**3M (Minnesota Mining and Manufacturing) Company**

Name of parent company (if any)

**1331 Commerce Street**

Street address

Street address (continued)

**Petaluma, CA 94952**

City/State/Zip code

Give us information about your contact person for the  
National Environmental Achievement Track Program.

Name **Gabriela Enescu**

Title **EHS Coordinator**

Phone **(707) 765-3255**

Fax **(707) 765-3273**

E-mail **gbenescu@mmm.com**

***Why do we need this information?***

EPA needs background information on your facility to evaluate your application.

***What do you need to do?***

- Provide background information on your facility.
- Identify your environmental requirements.

# Section A

*Tell us about your facility.*

1 What do you do or make at your facility?

**3M Optical Systems is a manufacturing facility located in Petaluma, California. The facility manufactures and markets privacy filters for desktop and laptop computers, VanGard lenses, and Press-on optical lenses.**

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC  
**3827 3081 3851**

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50  
☒ 50-99  
☐ 100-499  
☐ 500-1,000  
☐ More than 1,000

5 Does your facility have an EPA ID number(s)?

☒ Yes ☐ No

If yes, list in the right-hand column.

**CAT 080033368**

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

**3M Worldwide, including 3M Optical Systems - Petaluma, has long been involved and committed to pollution prevention and emissions reduction programs. Since 1975, 3M worldwide has developed over 3,000 projects that have prevented over 1 billion pounds per year of pollution with a corresponding savings of over \$500 million. The plant has done exceptionally well in meeting the 3M "Year 2000 Environmental Goals" in which 3M plants strived to reduce releases to the environment by 90% based on a 1990 baseline. 3M received Waste Reduction Award Program (WRAP 2000) from Integrated Waste Management Board. 3M Optical Systems - Petaluma has a "ZERO Discharge" permit with the City of Petaluma. That is, the facility does not discharge any process wastewater into the POTW.**

***Why do we need this information?***

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

***What do you need to do?***

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

# Section B

*Tell us about your EMS.*

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

*a.* Environmental policy

☒ Yes

*b.* Planning

☒ Yes

*c.* Implementation and operation

☒ Yes

*d.* Checking and corrective action

☒ Yes

*e.* Management review

☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)?

☒ Yes

3 Did this cycle include both an EMS and a compliance audit?

☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS?

☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

☐ Other

# Section C

*Tell us about your past achievements and future commitments.*

## ***Why do we need this information?***

Facilities must show that they are committed to improving their environmental performance.

This means that you can describe past achievements and will make future commitments.

## ***What do you need to do?***

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

**Note to small facilities:** If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

## ***First aspect you've selected***

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units waste/material throughput	Quantity	Units waste/material throughput
<b>Total Waste - Waste Ratio</b>	<b>40.2%</b>		<b>20%</b>	
<p>i. How is the current level an improvement over the previous level?</p> <p><b>The waste ratio has been reduced significantly in the past two years with current ratio at 20%. Waste ratio is measured by dividing the waste generated by the sum of good output, by-product, and waste generated.</b></p> <p>ii. How did you achieve this improvement?</p> <p><b>These improvements were achieved by implementing quality and yield improvements, increasing recycling efforts, and developing new material reuse projects. For example, 95% of the light control film waste are recycled or sent to the customer.</b></p>				

**Second aspect you've selected**

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
Energy Usage	Quantity	Units	Quantity	Units
	62.5	MMBTU/1,000 Lb products	50.4	MMBTU/1,000 Lb products
<p>i. How is the current level an improvement over the previous level?</p> <p><b>The facility has managed to reduce its energy usage from two years by 12% considering the energy crisis in California.</b></p>				
<p>ii. How did you achieve this improvement?</p> <p><b>The facility implemented energy conservation plans and developed less energy intensive processing methods.</b></p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

**Note to small facilities:** If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

**First aspect you've selected**

- a. What is the aspect? **Waste - Total Waste**
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A:  
Absolute value (Quantity/Units)
- ☒ Option B:  
In terms of units of **20 % waste/material throughput**

- production or output
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A:  
Absolute value  
(Quantity/Units)
- ☒ Option B:  
In terms of units of production or output  
**5 % waste/material throughput**
- e. How will you achieve this improvement?
- The improvement could be achieved by increasing recycling efforts and developing new material reuse projects.**

### ***Second aspect you've selected***

- a. What is the aspect?
- Energy Usage**
- b. Is this aspect identified as significant in your EMS?
- ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A:  
Absolute value  
**50.41 MMBTU/1,000 Lb products**
- ☒ Option B:  
In terms of units of production or output  
(Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A:  
Absolute value  
(Quantity/Units)
- ☒ Option B:  
In terms of units of production or output  
**3 % MMBTU/1,000 Lb products**
- e. How will you achieve this improvement?
- The facility will continue to implement energy conservation plans and develop less-energy intensive processing methods.**

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**Third aspect you've selected**

a. What is the aspect?

**Waste Generation - Hazardous Waste**

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:  
Absolute value

(Quantity/Units)

☒ Option B:  
In terms of  
units of production  
or output

**0.34**  
**haz. Waste generated**  
**/ 1,000 Lb. products**

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:  
Absolute value

(Quantity/Units)

☒ Option B:  
In terms of  
units of production  
or output

**5 % Reduction**  
(Quantity/Units)

e. How will you achieve this improvement?

**Source reduction and recycling.**

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**Fourth aspect you've selected**

a. What is the aspect?

**Wastewater Recovery and Reuse**

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:  
Absolute value

**50 %**  
**wastewater input/Clean**  
**Water Recovered**

☐ Option B:  
In terms of  
units of production  
or output

(Quantity/Units)



d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:  
Absolute value (Quantity/Units)

☒ Option B: **Increase recovery and reuse by 5%**  
In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement?

**The facility has a "Zero Discharge" permit with the City of Petaluma. The facility will continue to reuse the water from the process for cooling purposes and for grounds-keeping.**

# Section D

*Tell us about your public outreach and reporting.*

## ***Why do we need this information?***

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

## ***What do you need to do?***

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

**All community communications are responded to by the EHS department during business hours. The plant manager and/or backup corporate public relations is responsible for all media communications. 3M Optical Systems - Petaluma environmental policy is available for the public and also posted at the facility main entrance.**

2 How do you inform community members of important matters that affect them?

**Annual Reports  
News Media  
Community Poster Talks  
Pamphlets & Brochures**

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website [www.3m.com/profile/envt/news/index.html](http://www.3m.com/profile/envt/news/index.html)

☒ Newspaper

☒ Open Houses

☐ Other

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/Citizen Group</i>	<b>City of Petaluma Mayor</b>	<b>Clark Thompson</b>	<b>(707) 778-4345</b>
<i>State/Local Regulator</i>	<b>Petaluma Fire Department Hazardous Waste Section CUPA</b>	<b>J.W. Seely</b>	<b>(707) 778-4389</b>
	<b>Petaluma – POTW Industrial Waste Department</b>	<b>Martin St. George</b>	<b>(707) 778-5892</b>
<i>Other community/local reference</i>	<b>Petaluma People's Services</b>	<b>Barbara Schroeder</b>	<b>(707) 765-8488</b>
	<b>Polly Klass Foundation</b>	<b>Paula Skuratowicz</b>	<b>(707) 769-1334</b>

# Section E

## *Application and Participation Statement.*

On behalf of **3M Optical Systems Division**  
**Petaluma, CA**

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Printed Name/Title **Steve Reid / Plant Manager**

Facility Name **3M Optical Systems**

Facility Street Address **1331 Commerce Street, Petaluma, CA 94952**

Facility ID Numbers **CAT 080033368 CA 3202**

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail [ptrack@indecon.com](mailto:ptrack@indecon.com). Mail completed applications to:

The Performance Track Information Center  
c/o Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140

## National Environmental Achievement Track

### *Environmental Requirements Checklist*

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

**Facility Name**                      **3M Optical Systems**  
**Facility Location:**            **Petaluma, CA**  
**Facility ID Number(s):**      **CAT 080033368**  
*(attach additional sheets*  
*if necessary)*

#### **Air Pollution Regulations**

Check All  
That Apply

- |   |                                     |
|---|-------------------------------------|
| 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) | <input type="checkbox"/>            |
| 2. Permits and Registration of Air Pollution Sources                    | <input checked="" type="checkbox"/> |
| 3. General Emission Standards, Prohibitions and Restrictions            | <input checked="" type="checkbox"/> |
| 4. Control of Incinerators  | <input type="checkbox"/>            |
| 5. Process Industry Emission Standards                                  | <input type="checkbox"/>            |
| 6. Control of Fuel Burning Equipment                                    | <input type="checkbox"/>            |
| 7. Control of VOCs  | <input checked="" type="checkbox"/> |
| 8. Sampling, Testing and Reporting                                      | <input checked="" type="checkbox"/> |
| 9. Visible Emissions Standards  | <input checked="" type="checkbox"/> |
| 10. Control of Fugitive Dust  | <input type="checkbox"/>            |
| 11. Toxic Air Pollutants Control  | <input type="checkbox"/>            |
| 12. Vehicle Emissions Inspections and Testing                           | <input type="checkbox"/>            |

**Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above**  
(identify)

- |     |                          |
|-----|--------------------------|
| 13. | <input type="checkbox"/> |
| 14. | <input type="checkbox"/> |

#### **Hazardous Waste Management Regulations**

- |   |                                     |
|---|-------------------------------------|
| 1. Identification and Listing of Hazardous Waste (40 CFR 261)         |                                     |
| - Characteristic Waste  | <input checked="" type="checkbox"/> |
| - Listed Waste  | <input checked="" type="checkbox"/> |
| 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262) |                                     |
| - Manifesting   | <input checked="" type="checkbox"/> |

- Pre-transport requirements ☒
- Record keeping/reporting ☒
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
  - Transfer facility requirements ☐
  - Manifest system and record-keeping ☐
  - Hazardous waste discharges ☐
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
  - General facility standards ☐
  - Preparedness and prevention ☐
  - Contingency plan and emergency procedures ☐
  - Manifest system, Record keeping and reporting ☐
  - Groundwater protection ☐
  - Financial requirements ☐
  - Use and management of containers ☐
  - Tanks ☐
  - Waste piles ☐
  - Land treatment ☐
  - Incinerators ☐
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
- 7. Administered Permit Program (Part B) (40 CFR 270) ☐

**Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)**

- 8. ☐
- 9. ☐

**Hazardous Materials Management**

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☐
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☐
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☐
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
- 5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

**Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)**

- 6. ☐
- 7. ☐

**Solid Waste Management**

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
- 2. Permit Requirements for Solid Waste Disposal Facilities ☐
- 3. Installation of Systems of Refuse Disposal ☐

4. Solid Waste Storage and Removal Requirements ☐
5. Disposal Requirements for Special Wastes ☐

**Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)**

6. ☐
7. ☐

**Water Pollution Control Requirements**

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) ☐
2. Designation of Hazardous Substances (40 CFR 116) ☐
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) ☐
4. NPDES Permit Requirements (40 CFR 122) ☒
5. Toxic Pollutant Effluent Standards (40 CFR 129) ☐
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) ☐
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) ☐
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) ☐
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) ☐
10. Water Quality Standards ☐
11. Effluent Limitations for Direct Dischargers ☐
12. Permit Monitoring/Reporting Requirements ☐
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants ☐
14. Collection, Handling, Processing of Sewage Sludge ☐
15. Oil Discharge Containment, Control and Cleanup ☐
16. Standards Applicable to Indirect Discharges (Pretreatment) ☐

**Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)**

17. ☐
18. ☐

**Drinking Water Regulations**

1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) ☐
2. National Primary Drinking Water Standards (40 CFR 141) ☒
3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) ☐
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources ☐
5. Underground Injection Control Requirements ☐



6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

**Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)**

7. ☐  
8. ☐

**Toxic Substances**

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐  
2. Import and Export of Chemicals (40 CFR 707) ☐  
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☐  
4. Chemical Information Rules (40 CFR 712) ☐  
5. Health and Safety Data Reporting (40 CFR 716) ☐  
6. Pre-Manufacture Notifications (40 CFR 720) ☐  
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☐  
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐  
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

**Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)**

10. ☐  
11. ☐

**Pesticide Regulations**

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐  
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐  
3. Certification of Pesticide Applications (40 CFR 171) ☐  
4. Pesticide Licensing Requirements ☐  
5. Labeling of Pesticides ☐  
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐  
7. Disposal of Pesticide Containers ☐  
8. Restricted Use and Prohibited Pesticides ☐

**Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)**

9. ☐  
10. ☐

**Environmental Clean-Up, Restoration, Corrective Action**

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify) ☐  
☐

2. RCRA Corrective Action (identify)

☐  
☐

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration,  
Corrective Action Regulations Not Listed Above (identify)**

3.

☐

4.

☐